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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MACKENZIE STRABALA, an individual;

Plaintiff,

vs.

MID-CENTURY INSURANCE
COMPANY, a domestic stock; DOES I
through XX, inclusive; and ROE
CORPORATIONS I through XX, inclusive;

Defendants.

CASE NO.: 2:21-cv-01537-JAD-EJY

**PLAINTIFF'S STIPULATION FOR AN
EXTENSION OF TIME TO DISCLOSE
INITIAL EXPERTS ONLY**

[FIRST REQUEST]

Plaintiff, MACKENZIE STRABALA, by and through her counsel of record, Mainor Wirth, LLP and Defendant, MID-CENTURY INSURANCE COMPANY, by and through its counsel of record, The Feldman Firm, hereby agree to a one-week extension for initial expert disclosure deadline, and respectfully request that the Court approve the parties' stipulation for the following reasons:

1. The current initial expert deadline is September 14, 2022, pursuant to the Order Granting Stipulation to Enlarge Discovery Plan and Scheduling Order [ECF 23], entered on August 9, 2022.

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2. Plaintiff has recently become aware that one of her retained experts has been dealing with an unexpected family medical issue and has therefore requested a short, one-week extension of time for initial expert disclosure. This would make the new deadline for initial expert disclosure being September 21, 2022.

3. All other case deadlines will remain the same, pursuant to the current Discovery Plan and Scheduling Order [ECF 23].

This Request for an extension of time is not sought for any improper purpose or other purpose of delay.

WHEREFORE, the parties respectfully request that this Court extend the initial expert disclosure deadline to September 21, 2022, and keep all other case deadlines in accordance with the current Discovery Plan and Scheduling Order [ECF 23].

DATED this 8th day of September, 2022.

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/s/ Breanna Hartmann

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DATED this 8th day of September, 2022.

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/s/ David Feldman

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.

DATED this 8th day of September, 2022.


 UNITED STATES MAGISTRATE JUDGE